

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
NORTHERN DIVISION**

LOUIS G. JONES, JR.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 3:22-cv-00341
	)	
FORD MOTOR COMPANY,	)	JURY DEMAND
	)	
Defendant.	)	

**NOTICE OF REMOVAL**

COMES Defendant FORD MOTOR COMPANY (“Ford”), and, pursuant to 28 U.S.C. § 1332 and 28 U.S.C. § 1446(b) respectfully shows the Court:

**I. BACKGROUND**

On September 2, 2022, Ford was served with a summons and Complaint, attached hereto as *Exhibit A*, in a case styled *Louis G. Jones, Jr., v. Ford Motor Company*, No. 2022-CV-105, in the Circuit Court for Roane County, Tennessee.

**III. BASIS FOR REMOVAL**

The Court has subject matter jurisdiction under 28 U.S.C. § 1332(a)(1) because complete diversity exists between Plaintiff and Ford, and the amount in controversy exceeds \$75,000. Plaintiff is a citizen of the State of Tennessee. Compl., ¶ 1. Ford is, and was at all times relevant to this case, a corporation organized under the laws of the State of Delaware with its principal place of business in the State of Michigan. *Accord id.*, ¶ 2. Accordingly, Ford is a citizen of the States of Delaware and Michigan for diversity purposes. 28 U.S.C. § 1332(c)(1) (2022). The Defendant was not a citizen of the State of Tennessee at the time that Plaintiff commenced his lawsuit, and the Defendant is not presently a citizen of the State of Tennessee. In his Complaint,

Plaintiff prays for damages of \$3,500,000. Compl. at p. 4. Thus, Plaintiff's amount in controversy is more than \$75,000, exclusive of interest and costs.

**IV. FORD HAS MET ALL PROCEDURAL REQUIREMENTS FOR REMOVAL**

This Notice of Removal is filed within 30 days of the date on which the case has become removable and within one year from the date the action was commenced. A true copy of this Notice of Removal is concurrently filed with the Circuit Court for Roane County, Tennessee as required by 28 U.S.C. §1446(d) (2022).

WHEREFORE, Defendant Ford Motor Company gives notice that the action now pending against it in the Circuit Court for Roane County, Tennessee has been removed therefrom to this Court.

DATED this 30th day of September, 2022.

Respectfully submitted,

LEWIS, THOMASON,  
KING, KRIEG & WALDROP, P.C.

By: /s/ J. Randolph Bibb, Jr.  
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*Counsel for Defendant  
Ford Motor Company*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and exact copy of the forgoing Notice of Removal has been served upon the counsel for the parties in interest herein by U.S. mail, first class postage prepaid.

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*Counsel for Plaintiff*

Dated this 30th day of September, 2022.

/s/ J. Randolph Bibb, Jr.  
J. Randolph Bibb, Jr.